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Attorneys for Defendants
WHOLE FOODS MARKET CALIFORNIA, INC. and
MRS. GOOCH'S NATURAL FOOD MARKETS,
INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MARY GARRISON and GRACE
GARRISON, individually, and on behalf of all
others similarly situated,

Plaintiffs,

v.

WHOLE FOODS MARKET CALIFORNIA,
INC., et al.,

Defendants.

Case No. 3:14-CV-00334-VC

**STIPULATION AND ~~PROPOSED~~
ORDER FOR LIMITED
MODIFICATION TO SCHEDULING
ORDER**

Pursuant to Local Rule 6-1(b), Plaintiffs MARY GARRISON and GRACE GARRISON, individually, and on behalf of all others similarly situated (collectively "Plaintiffs"), on the one hand, and Defendants WHOLE FOODS MARKET CALIFORNIA, INC. and MRS. GOOCH'S NATURAL FOOD MARKETS, INC. (collectively "Defendants"), by and through their undersigned counsel, hereby stipulate as follows:

WHEREAS, on March 18, 2015, the Court ordered that the Parties submit a stipulated ESI Protocol on or before March 24, 2015 to the extent the Parties were able to reach an agreement by that time. To the extent the Parties did not reach an agreement by that time, the

1 Court ordered the Parties to provide an update to the Court in their Updated Joint Case
2 Management Conference Statement.

3 WHEREAS, in the Parties Joint Updated Case Management Conference Statement, the
4 Parties indicated that they would be prepared to file a joint letter brief as to their dispute
5 regarding the development of a stipulated ESI Protocol on or before April 3, 2015.

6 WHEREAS, at the March 31, 2015 case management conference, the Parties discussed
7 with the Court their subsequent efforts to confer and agreed to file an ESI Protocol or joint letter
8 brief regarding any outstanding dispute as to the development of an ESI Protocol on or before
9 April 10, 2014.

10 WHEREAS, the Court requested the Parties submit a stipulation documenting the agreed
11 proposal.

12 IT IS THEREFORE STIPULATED that:

13 1. Instead of filing a joint letter brief to the Court on or before April 3, 2015, the
14 Parties shall submit a stipulated ESI Protocol or joint letter brief as to any issues in dispute
15 regarding the development of an ESI Protocol on or before April 10, 2015.

16 2. All other deadlines remain unchanged.

17 IT IS SO STIPULATED.

18 DATED: April 2, 2015

SEYFARTH SHAW LLP

19 By: /s/ Joseph J. Orzano

20 Jay W. Connolly
21 Giovanna A. Ferrari
22 Joseph J. Orzano

23 Attorneys for Defendants
24 WHOLE FOODS MARKET CALIFORNIA,
25 INC. and MRS. GOOCH'S NATURAL FOOD
26 MARKETS, INC.
27
28

1 DATED: April 2, 2015

SCOTT COLE & ASSOCIATES, APC

2 By: /s/ Molly A. Desario

3 Matthew R. Bainer

4 Molly a. DeSario

5 Attorneys for Plaintiffs

MARY GARRISON and GRACE

6 GARRISON, individually and on behalf of all
7 other similarly situated

8 **PROPOSED ORDER**

9 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

10 1. Instead of filing a joint letter brief to the Court on or before April 3, 2015, the
11 Parties shall submit a stipulated ESI Protocol or joint letter brief as to any issues in dispute
12 regarding the development of an ESI Protocol on or before April 10, 2015.

13 2. All other deadlines remain unchanged.

14
15 DATED: April 6, 2015



16 HON. VINCE CHHABRIA
17 United States District Court Judge

18 19551034v.1